

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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DATE FILED: 3/1/10

Takeda Chemical Industries, Ltd., and  
Takeda Pharmaceuticals North America, Inc.  
Plaintiffs,

v.

Ranbaxy Laboratories, Ltd., and  
Ranbaxy Pharmaceuticals, Inc.  
Defendants.

Civil Action No.  
03-CV-8250 (DLC)

Takeda Chemical Industries, Ltd., and  
Takeda Pharmaceuticals North America, Inc.  
Plaintiffs,

v.

Mylan Laboratories, Inc.,  
Mylan Pharmaceuticals, Inc., and  
UDL Laboratories, Inc.,  
Defendants.

Civil Action No.  
03-CV-8253 (DLC)

Takeda Chemical Industries, Ltd., and  
Takeda Pharmaceuticals North America, Inc.  
Plaintiffs,

v.

Alphapharm Pty. Ltd., and Genpharm, Inc.,  
Defendants.

Civil Action No.  
04 CV 1966 (DLC)

Takeda Chemical Industries, Ltd., and  
Takeda Pharmaceuticals North America, Inc.  
Plaintiffs,

v.

Watson Pharmaceuticals, Inc.,  
Watson Laboratories, Inc.,  
Watson Pharma, Inc., and  
Danbury Pharmacal, Inc.,  
Defendants.

Civil Action No.  
03-CV-8254 (DLC)

Takeda Pharmaceutical Company Limited and  
Takeda Pharmaceuticals North America, Inc.,  
Plaintiffs,

v.

Sandoz, Inc.,

Defendant.

Civil Action No.  
07 CV 3844 (DLC)

Takeda Pharmaceutical Company Limited,  
Takeda Pharmaceuticals North America, Inc., and  
Takeda Global Research and Development  
Center, Inc.,

Plaintiffs,

v.

Mylan Inc., Mylan Pharmaceuticals, Inc., and  
UDL Laboratories, Inc.,

Defendants.

Civil Action No.  
08 CV 6999 (DLC)

Takeda Pharmaceutical Company Limited  
Takeda Pharmaceuticals North America, Inc., and  
Takeda Global Research and Development  
Center, Inc.,

Plaintiffs,

v.

Teva Pharmaceutical Industries Ltd.,  
Teva Pharmaceuticals USA, Inc.,

Defendants.

Civil Action No.  
09 CV 4655 (DLC)

Takeda Pharmaceutical Company Limited  
Takeda Pharmaceuticals North America, Inc., and  
Takeda Global Research and Development  
Center, Inc.,

Plaintiffs,

v.

Sandoz, Inc.,

Defendant.

Civil Action No.  
09 CV 5210 (DLC)

Takeda Pharmaceutical Company Limited and	)
Takeda Pharmaceuticals North America, Inc.,	)
Plaintiffs,	)
	)
v.	)
	)
Torrent Pharmaceuticals Limited and	)
Torrent Pharma Inc.,	)
Defendants.	)

Civil Action No.  
09 CV 6051 (DLC)

### STIPULATION

Subject to the approval of the Court, it is hereby stipulated and agreed by counsel for Plaintiffs, Takeda Chemical Industries, Ltd., Takeda Pharmaceuticals North America, Inc., Takeda Pharmaceutical Company Limited, and Takeda Global Research and Development Center, Inc. (collectively "Takeda") and Defendants Ranbaxy Laboratories, Ltd. and Ranbaxy Pharmaceuticals, Inc. (collectively "Ranbaxy"); Mylan Laboratories, Inc., Mylan Pharmaceuticals, Inc., UDL Laboratories, Inc., and Mylan Inc. (collectively "Mylan"); Alphapharm Pty., Ltd., and Genpharm, Inc. (collectively "Alphapharm"); Watson Pharmaceuticals, Inc., Watson Laboratories, Inc., Watson Pharma, Inc. and Danbury Pharmacal, Inc. (collectively "Watson"); Sandoz, Inc. ("Sandoz"); Teva Pharmaceutical Industries Ltd. and Teva Pharmaceuticals USA, Inc. (collectively "Teva"); and Torrent Pharmaceuticals Limited and Torrent Pharma Inc. (collectively "Torrent") that:

1. All fact discovery is to be completed by **March 17, 2010**;
2. Opening expert reports are to be served by **March 17, 2010**;
3. Supplemental opening expert reports (limited to incorporating testimony of any fact witness whose deposition is conducted on or after March 12, 2010) are to be served by **March 19, 2010**;
4. Responsive expert reports are to be served by **March 31, 2010**;

5. All expert discovery is to be completed by **April 9, 2010**;
6. Motions in limine due **April 12, 2010\***;
7. Joint pretrial order due **April 16, 2010\***;
8. Oppositions to motions in limine due on **April 19, 2010\***; and
9. Replies to oppositions to motions in limine due on **April 22, 2010\***.

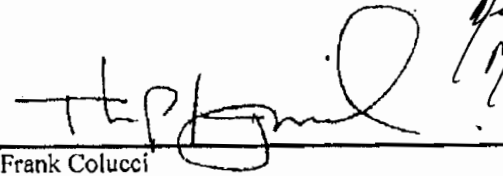
Dated: New York, NY  
February 26, 2010

Respectfully submitted,

*So ordered.*



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\*Consistent with the Court's instructions in the endorsed letter order of February 22, 2010, the parties are not seeking to modify dates designated with "\*." Rather, these dates are the same as those reflected in the Stipulation entered by the Court on January 21, 2010 (Doc. 157).

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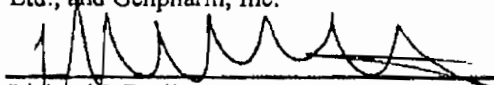
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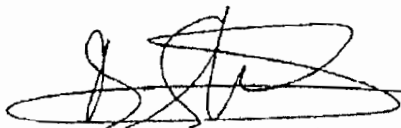
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SO ORDERED:

Dated: \_\_\_\_\_, 2010  
New York, New York

\_\_\_\_\_  
United States District Judge

